



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PJC/GSM
F. #2021R00254

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 1, 2022

By Email and ECF

The Honorable Raymond J. Dearie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keily Nunez, et al.
Criminal Docket No. 21-496 (RJD)

United States v. Ramon Osvaldo Pena
Criminal Docket No. 21-560 (RJD)

Dear Judge Dearie:

The government writes pursuant to the Court's March 3, 2022 order to provide an update regarding plea negotiations. The government remains in plea discussions with all remaining defendants and the parties are hopeful that the above-referenced cases will be resolved short of trial. Nonetheless, the government is preparing for trial, which is currently scheduled to begin following jury selection on October 5, 2022, and the government will be prepared to proceed on that date if necessary.

The government is available should Your Honor have any questions regarding the status of these cases.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/Patrick J. Campbell
Patrick J. Campbell
Trial Attorney
Criminal Division, Fraud Section
United States Department of Justice
(718) 254-6366

Garen S. Marshall
Assistant United States Attorney
(718) 254-6569

cc: Clerk of Court (RJD) (by email and ECF)
All counsel of record (ECF)